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Attorneys for Plaintiff  
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

VICTOR RICARDO GARZA PULIDO  
and  
JUAN CRISTOBAL IBARRA,

Defendants.

CR 2:25-cr-00209-AH

GOVERNMENT'S EX PARTE APPLICATION  
FOR ORDER SEALING INDICTMENT AND  
RELATED DOCUMENTS; DECLARATION OF  
DAVID C. LACHMAN

**(UNDER SEAL)**

The government hereby applies ex parte for an order that the indictment and any related documents in the above-titled case (except the arrest warrants for the charged defendants) be kept under seal until the government files a "Report Commencing Criminal Action" in this matter.

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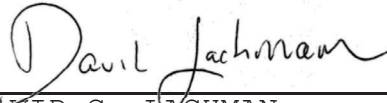
1 This ex parte application is made pursuant to Federal Rule of  
2 Criminal Procedure 6(e)(4) and is based on the attached declaration  
3 of DAVID C. LACHMAN.

4 Dated: March 25, 2025

Respectfully submitted,

5 JOSEPH T. MCNALLY  
6 Acting United States Attorney

7 DAVID T. RYAN  
8 Assistant United States Attorney  
9 Chief, National Security Division



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10 DAVID C. LACHMAN  
11 Assistant United States Attorney

12 Attorneys for Plaintiff  
13 UNITED STATES OF AMERICA  
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**DECLARATION OF DAVID C. LACHMAN**

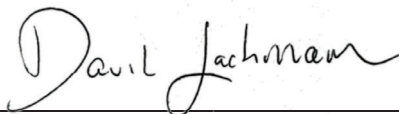
I, DAVID C. LACHMAN, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I represent the government in the prosecution of United States v. Victor Ricardo Garza Pulido et al., the indictment in which is being presented to a federal grand jury in the Central District of California on March 26, 2025].

2. The defendants charged in the above-captioned indictment have not been taken into custody on the charges contained in the indictment and have not been informed that they are being named as defendants in the indictment to be presented to the grand jury on March 26, 2025. The likelihood of apprehending defendants might be jeopardized if the indictment in this case were made publicly available before defendants are taken into custody on the indictment.

3. Accordingly, the government requests that the indictment and sealed documents in this case (except the arrest warrants) be sealed and remain so until one of the defendants is taken into custody on the charges contained in the indictment and the government files a "Report Commencing Criminal Action" in this matter.

4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Los Angeles, California, on March 25, 2025.



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DAVID C. LACHMAN